

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SCOTT MCMAHON, for himself and those similarly situated,)

Plaintiff,)

v.)

GALAXY ASSET PURCHASING LLC)
and CONVERGENT OUTSOURCING INC.)

Defendants.)

1:14CV5257

STIPULATION AS TO CLASS CERTIFICATION MOTION

The parties, by counsel, stipulate as follows:

Defendant stipulates that it will not make any offer or tender to plaintiff, including but not limited to an offer pursuant to Fed.R.Civ.P. 68, that would have the effect of mooted plaintiff's claims in this matter on behalf of the putative class defined in the complaint. In consideration of the foregoing, plaintiff stipulates to withdraw the pending motion for class certification without prejudice, and with general leave to re-file.

The parties agree that the preceding stipulation does not prevent the parties from making and considering settlement proposals from their opponents during the course of this case.

SO STIPULATED on February 24, 2015.

Respectfully submitted,

/s/ Thomas E. Soule
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CERTIFICATE OF SERVICE

I certify that Charity Olson (colson@olsonlawpc.com), counsel for defendants, was served with this document on February 24, 2015 by operation of the Court's electronic filing system.

/s/ Thomas E. Soule
Thomas E. Soule